

EXHIBIT A

GOLDSTEIN & GOLDSTEIN, LLP**Michael Goldstein, Esq.****Attorney ID No.: 025182008**

60 Evergreen Pl., Ste. 502

East Orange, New Jersey 07018

(973) 675-8277

Attorneys for Plaintiff(s)

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IRENE KYEDREBEOGO,

Plaintiff(s),

vs.

 AMAZON.COM, INC., NEXT ERA
 ENERGY RESOURCES, JOHN DOE NOS.
 1-10 and XYZ CORP. NOS. 1-10,

Defendant(s).

) SUPERIOR COURT OF NEW JERSEY

) LAW DIVISION: ESSEX COUNTY

) Docket No.: ESX-L-7984-20

)

) Civil Action

)

) **SUMMONS**

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FROM THE STATE OF NEW JERSEY**TO THE DEFENDANT(S) NAMED ABOVE:****NEXT ERA ENERGY RESOURCES**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529).

If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: November 30, 2020

/s/ Michelle M. Smith
MICHELLE M. SMITH
Superior Court Clerk

Defendant to be served:
Address for Service:

NEXT ERA ENERGY RESOURCES
700 Universe Blvd.
Juno Beach, FL 33408

GOLDSTEIN & GOLDSTEIN, LLP
Michael Goldstein, Esq.
Attorney ID No.: 025182008
60 Evergreen Pl., Ste. 502
East Orange, New Jersey 07018
(973) 675-8277
Attorneys for Plaintiff(s)

IRENE KYEDREBEOGO,
Plaintiff(s),

VS.

AMAZON.COM, INC., NEXT ERA
ENERGY RESOURCES, JOHN DOE NOS.
1-10 and XYZ CORP. NOS. 1-10,
Defendant(s).

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY**

Docket No.:

COMPLAINT AND JURY DEMAND

Plaintiff, IRENE KYEDREBEOGO, by way of Complaint against Defendant(s)
AMAZON.COM, INC., NEXT ERA ENERGY RESOURCES, JOHN DOE NOS. 1-10 and
XYZ CORP. NOS. 1-10, says:

PARTIES

1. Plaintiff, Irene Kyedregeogo ("Plaintiff"), is a New Jersey resident who resides in Newark, NJ.
2. Defendant, Amazon.com, Inc. ("Defendant" and/or "Amazon"), is an entity licensed to conduct business in New Jersey that operates a fulfilment center located at or near 240 Mantua Grove Road, West Deptford, NJ.
3. Defendant, Next Era Energy Resources ("Defendant" and/or "Next Energy") is an entity that owns, controls, rents, repairs, and/or maintains real property located at the Amazon Fulfilment Center, 240 Mantua Grove Road, West Deptford, NJ with a principal place of

business located at 292-296 Wainwright St., Newark, NJ with a principal place of business located at 700 Universe Blvd., Juno Beach, FL 33408.

4. Defendants John Doe Nos. 1-10 are fictitious individuals unknown at this time who owned, rented, controlled, worked and/or maintained the premises located at the Amazon Fulfilment Center, 240 Mantua Grove Road, West Deptford, NJ
5. Defendants XYZ Corp. Nos. 1-10 are fictitious entities unknown at this time that owned, rented, controlled, worked and/or maintained the premises located at the Amazon Fulfilment Center, 240 Mantua Grove Road, West Deptford, NJ

COUNT ONE – NEGLIGENCE

6. At all times relevant hereto, Defendant Amazon and/or Next Era owned, rented, controlled, maintained and/or operated the Amazon Fulfilment Center, 240 Mantua Grove Road, West Deptford, NJ and were responsible for maintaining the premises and keeping same in a safe condition.
7. On or about Decemebr 11, 2018, Plaintiff was delivering goods to the Amazon Fulfillment Cetner, 240 Mantua Grove Road, West Deptford, NJ (the “Subject Premises”), when a worker operating a forklift on the Subject Premises struck Plaintiff.
8. Upon information and belief, the aforementioned worker was employed by Defendant Next Era and/or Amazon.
9. At all times relevant herein, Plaintiff was a business invitee on the Subject Premises.
10. Upon information and belief, Defendants had actual knowledge of the aforementioned dangerous condition.
11. Upon information and belief, Defendants caused and/or created the aforementioned dangerous condition.

12. Defendants had constructive notice of the dangerous condition because the dangerous condition existed for such a period of time and was of such an obvious nature that the Defendants, in the exercise of due care, should have discovered the condition and its dangerous character.

13. As a direct and proximate result of the carelessness and negligence of Defendants, Plaintiff was caused to be injured and was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continued to be hampered in his daily routine.

WHEREFORE, Plaintiff demands judgment against Defendants for damages, interest, costs of suit, attorneys' fees and such other and further relief that the Court deems just and proper.

Dated: November 18, 2020

/s/ Michael J. Goldstein, Esq.

Michael J. Goldstein
Attorney for Plaintiff

CERTIFICATION

I hereby certify that, pursuant to R 4:5-1., the matter in controversy is not the subject of any other action or pending in any Court or of any arbitration proceeding and no such action or proceeding is contemplated. I know of no other party who should be joined in this action.

/s/ Michael J. Goldstein, Esq.

Michael J. Goldstein
Attorney for Plaintiff

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R. 4:25.4, Michael J. Goldstein, Esq. is hereby designated trial counsel in this matter.

JURY DEMAND

Plaintiff demands a trial by jury on all issues

Dated: November 18, 2020

/s/ Michael J. Goldstein, Esq.
Michael J. Goldstein, Esq.
Attorney for Plaintiff

Civil Case Information Statement

Case Details: ESSEX Civil Part Docket L-007984-20

Case Caption: KYEDREBEOGO IRENE VS

AMAZON.COM, INC.

Case Initiation Date: 11/20/2020

Attorney Name: MICHAEL J GOLDSTEIN

Firm Name: GOLDSTEIN & GOLDSTEIN, LLP

Address: 60 EVERGREEN PL STE 502

EAST ORANGE NJ 07018

Phone: 9736758277

Name of Party: PLAINTIFF : KYEDREBEOGO, IRENE

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: IRENE KYEDREBEOGO? NO

THE INFORMATION PROVIDED ON THIS FORM IS NOT BEING PROVIDED TO THE COURT FOR

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? YES Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/20/2020

Dated

/s/ MICHAEL J GOLDSTEIN

Signed

NJ SUPERIOR COURT LAWYER REFERRAL AND LEGAL SERVICE LIST**ATLANTIC COUNTY:**

Deputy Clerk, Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

ESSEX COUNTY:

Deputy Clerk, Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr.
Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

MONMOUTH COUNTY:

Deputy Clerk, Superior Court
Court House
P. O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk, Superior
Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

BERGEN COUNTY:

Deputy Clerk, Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2188

GLOUCESTER COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office,
Attn: Intake, First Fl., Court
House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington & Court Streets
P. O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

UNION COUNTY:

Deputy Clerk, Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-
8073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

BURLINGTON COUNTY:

Deputy Clerk, Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

HUDSON COUNTY:

Deputy Clerk, Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

OCEAN COUNTY:

Deputy Clerk, Superior Court
Court House, Room 121
118 Washington Street
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3668
LEGAL SERVICES
(732) 341-2727

WARREN COUNTY:

Deputy Clerk, Superior
Court
Civil Division, Court
House
413 Second Street
Belvidere, NJ 07823-
1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

CAMDEN COUNTY:

Deputy Clerk, Superior Court
Civil Processing Office
Hall of Justice
1st Fl, Suite 150
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0818
LEGAL SERVICES
(856) 964-2010

HUNTERDON COUNTY:

Deputy Clerk, Superior Court
Civil Division
85 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

PASSAIC COUNTY:

Deputy Clerk, Superior Court
Civil Division - Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

CAPE MAY COUNTY:

Deputy Clerk, Superior Court
9 N. Main Street
Cape May Court House, NJ
08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Deputy Clerk, Superior Court
Local Filing Office, Courthouse
175 S. Broad Street
P. O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

Deputy Clerk, Superior Court
Attn: Civil Case Management
Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

CUMBERLAND COUNTY:

Deputy Clerk, Superior Court
Civil Case Management Office
60 West Broad Street
P. O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

MIDDLESEX COUNTY:

Deputy Clerk, Superior Court
Middlesex Vicinage
Second Floor, Tower
56 Paterson Street
P. O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

SOMERSET COUNTY:

Deputy Clerk, Superior Court
Civil Division Office
40 North Bridge Street
P. O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840